

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

PIPELINE HEALTH SYSTEM, LLC., *et al.*,

Debtors.

Chapter 11

Case No. 22-90291 (MI)

(Jointly Administered)

TENET BUSINESS SERVICES CORPORATION, *et al.*,

Plaintiffs,

v.

SRC HOSPITAL INVESTMENTS II, LLC, *et al.*,

Defendants.

Adv. No. 23-03078 (lead case),
consolidated with Adv. Nos 23-
03079, 23-03080, 23-03081 and
23-03082

**JOINT STATEMENT TO THE COURT REGARDING DISCOVERY AND
MOTION TO CONTINUE JUNE 26, 2024 DISCOVERY CONFERENCE**

Defendants SRC Hospital Investments II, LLC (“**SRC**”); River Forest Property Holdings, LLC; Weiss MOB Property Holdings, LLC; Weiss Property Holdings, LLC; and West Suburban Property Holdings, LLC (the “**Defendants**” or “**Debtors**”), together with Plaintiff Tenet Business Services Corporation and the other above-captioned plaintiffs (the “**Tenet Entities**”) (and together with Defendants, the “**Parties**”) submit this update on the status of discovery and request that the Court continue the discovery status conference scheduled for June 26, 2024, to August 1, 2024.

A. Update to the Court on the Status of Discovery

1. As the Court is aware, the Parties have been engaged in discovery to locate “Key Documents,” which has included a 30(b)(6) deposition of Pipeline Health System, LLC (“**Pipeline**”), Defendants’ parent.

2. At the May 21 discovery conference, the Court ordered that if Defendants produced

the outstanding remittance advices by June 10, 2024, a further 30(b)(6) deposition on discovery would be moot. If Defendants were unable to do so, the Court ordered Defendants and Pipeline to produce a 30(b)(6) witness pursuant to a new notice. The Court set the next conference for June 26, 2024.

3. On May 29, 2024, the Tenet Entities noticed a 30(b)(6) deposition to Defendants and Pipeline for June 20, 2024.

4. On June 3, 2024, Pipeline and Defendants sent a letter to the Tenet Entities to meet and confer about: (1) the status of the remittance advices; and (2) the examination topics in the latest 30(b)(6) deposition notice.

5. On June 11, 2024, Defendants and Pipeline emailed the Tenet Entities indicating that Defendants' and Pipeline's counsel was now unavailable on June 20 and requested to reset the deposition to June 24, 2024, and to continue the Parties' meet and confer efforts. The Tenet Entities indicated they were not available on June 24, 2024.

6. The Parties have agreed to continue the 30(b)(6) witness deposition to the week of July 15 or July 22 to allow time to confer and have further agreed to hold a conference of counsel during the original discovery status conference date and time—June 26 at 3:00 p.m.

B. Request to the Court

7. The undersigned submit this joint statement to update the Court on the status of discovery, to reset the requirement that Defendants and Pipeline produce 30(b)(6) witnesses to the week of July 15 or July 22, and to request a continuance of the discovery conference currently scheduled for June 26, 2024, to August 1, 2024 at 3:00 p.m. Central Time, or such other date amenable to the Court's schedule.

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AGREED & SUBMITTED

<i>/s/ Jared M. Slade</i>	<i>/s/ Kathryn F. Benson</i>
Jared M. Slade Leah Fiorenza McNeill Jacob A. Johnson ALSTON & BIRD LLP <i>Counsel for Tenet Business Services Corporation and certain affiliates</i> *Signed with permission	Keith W. Carlson Lil G. Delcampo Kathrynn F. Benson CARLSON & JAYAKUMAR LLP <i>Co-Counsel for Defendant Debtors</i>

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2024, a true and correct copy of the foregoing was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Kathryn F. Benson /

Kathrynn F. Benson
Counsel for Defendants